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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GINA WILLIAMS,

S.D. OF N.Y. Civ.No 18-5912 (RJS)

Plaintiff,

-against-

NEW YORK CITY HOUSING AUTHORITY,  
CAROLYN JASPER, CESAR GONZALEZ,  
MATTHEW HOFFMAN, RODNEY DAVIS, and  
THELMA WATKINS

**AMENDED  
INITIAL DISCLOSURES  
UNDER FRCP 26(a) OF  
DEFENDANTS NEW YORK  
CITY HOUSING AUTHORITY  
CAROLYN JASPER, CESAR  
GONZALEZ, MATTHEW  
HOFFMAN, RODNEY DAVIS,  
and THELMA WATKINS**

Defendants.

**Plaintiff Gina Williams hereby submit the following initial disclosures under Federal Rule of Civil Procedure ("FRCP") 26 (a)(1):**

Plaintiff likely to have discoverable information that Plaintiff may use to support her allegations in the amended complaint: Emails, Consent Decree signed by Chairperson Stanley Brezenoff June 11, 2018. News articles, Response letters from the New York City Housing Authority, All defendant's personnel employment files, disciplinary records, promotions and demotions including defendants witness Xenia Rivera, Responses from the EEOC, April 24, 2018 New York City Counsel transcript, employees emails, Counseling memorandums issued to plaintiff, Local hearing.

**1. Individuals likely to have discoverable information that Plaintiff may use to support her discoverable information.**

a. Plaintiff Gina Williams

Documents that has already been submitted to the courts in the

amended complaint and information obtain through discovery from Defendants .

**Documents that Plaintiff may use to support her allegations (FRCP)**

**26(A)(1)(A)(ii).**

2. Collective bargaining agreement, Defendant's NYCHA policy, website article from the previous Tenant Association President of Pomonok Houses Monica Corbett.

Plaintiff investigation and search for documents upon which it may rely in its prosecution of this action is continuing. Plaintiff reserve the right to supplement these documents as additional documents are located.

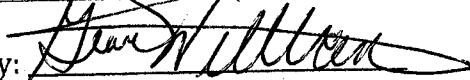
**3. A computation of each category of damages (FRCP 26(a)(1)(A)(iii).**

Pain, suffering mental anguish, and embarrassment.

4. Plaintiff will review any negotiation and settlement offers or any ward the Jury may grant or the court may deem just. Plaintiff will supplement damage confrontation damages upon discovery and current ongoing discriminatory acts,(FRCP 26(A)(1)(A)(iv).

Dated: Queens, New York  
October 30, 2018

Gina Williams  
Plaintiff - Pro Se  
146-17 182<sup>nd</sup> Street  
Springfield Gardens, N.Y. 11413  
Tel: (347) 886-7802  
Ginawms@verizon.net

By:   
Gina Williams

To: KELLY D. MacNEAL  
EVP for Legal Affairs and General Counsel  
New York City Housing Authority  
Nabiha Rahman  
Attorney for Defendants  
250 Broadway, 9<sup>th</sup> floor  
New York, N.Y. 10007  
Tel. No.: (212) 776-5043  
Fax No.: (212) 776-5402  
Nabiha.rahman@nyc.ha.ny.gov

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Gina Williams

(List the name(s) of the plaintiff(s)/petitioner(s).)

18 Civ. 5912 (RJS)

- against -

New York City Housing  
Authority et al

AFFIRMATION OF SERVICE

(List the name(s) of the defendant(s)/respondent(s).)

I, (print your name) FREderick Jones, declare under penalty of perjury that I served a copy of the attached (list the names of the documents you served): Initial disclosures letter

upon all other parties in this case by (state how you served the documents, for example hand delivery, mail, overnight express) 250 BROADWAY, NY NY 10007 to the following persons (list the names and addresses of the people you served): NYCHA, CAROLYN JASPER, CESAR GONZALEZ, MATTHEW HOFFMAN, RODNEY DAVIS, Thelma WATKINS

on (date you served the document(s)) October 30, 2018

October 30, 2018  
Dated

FREderick Jones

Signature

Melank Green

Address

107-05 SUTPHIN BLVD APP2D

City, State

JAMAICA NY 11435

Zip

Telephone Number

646-552-7940

E-Mail Address